

KEYS TO VALID NEGATIVE ACTIONS



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“Negatives 101”

Negative actions include cases terminated, denied or suspended. As with food stamp payment accuracy, the validity of negative actions has always been a priority of the U.S. Department of Agriculture, Food and Nutrition Service. State Quality Control (QC) has included negative actions in its sample since the regulatory mandate of the QC process. Initially Federal re-review of a State's QC negative case sample was only conducted if the State was eligible for “enhanced funding.” Since Federal Fiscal Year (FFY) 2000, FNS began validating negative actions for all States each year. Since this time, error rates for negative actions have increased considerably in many States.

Inaccurately or inappropriately terminating, denying or suspending a household causes great hardship to the client(s) and hampers access to the Food Stamp Program. Without the food assistance they are seeking, children and adults may go hungry unnecessarily. Therefore, it is imperative that all eligibility staff has a clear understanding of food stamp policies and procedures and applies them consistently.

The FNS Regional Payment Accuracy Coordinators have been working with State and local-level staff from around the country to identify what is believed to be the most critical initiatives undertaken to ensure accurate negative actions:

- ❑ Ensuring worker awareness of the importance of providing access to the program, by accurately evaluating a household's eligibility, and the consequences of erroneously denying eligibility, or terminating/suspending a household's benefits.
- ❑ Communicating top-level management commitment on the importance of ensuring that only appropriate negative actions are taken.
- ❑ Analyzing all data available to determine the root causes of invalid decisions identified through QC and other sources.
- ❑ Having an effective case review process in place to identify and correct inaccurate or inappropriate negative actions immediately.
- ❑ Planning corrective action initiatives to timely and effectively reduce or eliminate problem areas identified.
- ❑ Ensuring eligibility workers know the proper way to clearly document case records when a negative action is taken.
- ❑ Maintaining an effective automated eligibility system that fully supports the accurate determination of Food Stamp Program eligibility.
- ❑ Providing resource and reference tools to workers and supervisors to help them more accurately and effectively determine eligibility.
- ❑ Ensuring clients are well-informed about timeframes and what they must provide to the agency to verify their eligibility.

Having a thorough understanding of what constitutes an invalid negative action and what can be done to prevent this from occurring can effectively improve customer service and access to the Food

Stamp Program. As you read on, assess your operation to determine which practices can help your agency.

Culture of a Low Negative Error Rate

It is our responsibility to see to it that all who are eligible to participate in the Food Stamp Program (FSP) have access to the program and that unnecessary barriers to participation are removed. Clients should be treated with respect, which is best demonstrated through excellent customer service. Correctly determining denials, terminations or suspensions is essential to good customer service and program access. This important message must be imparted to staff from top leadership, local office directors and supervisors, as well as through staff training. In an era when only slightly more than half of those who are eligible actually participate in the FSP, it is vital that we do not erroneously turn away potentially eligible clients.

Here are some tips for ensuring the office “culture” supports good customer service:

- Emphasize to case workers the importance of correctly determining all negative actions and ensure they understand how the negative error rate represents both USDA priorities of access and integrity. This includes explaining how an incorrect denial, termination or suspension can negatively impact an eligible household.
- Have top leadership develop a “marketing plan” to discuss the importance of correct case determinations, stressing the positive economic impacts the FSP has on the local economy.
- Implement supervisory reviews of denials, terminations and suspensions. It is very important to review this category of cases for accuracy, especially with new workers. Workers should be accountable for the accuracy of all decisions made.
- Recognize eligibility workers for a job well done. This not only boosts staff morale but also creates a positive work environment. When negative case actions are determined to be correct by QC or supervisory reviews, workers should be recognized. Examples of employee recognition include: individual notes, e-mails or certificates for a job well done or to develop a campaign to encourage correct negative actions. The idea is to create friendly competition between workers, units or local offices to want to do the best work possible.
- Provide clients the information they need to apply for the FSP when they first contact local office. Clearly inform clients about the verification requirements and the due dates for providing documentation, as well as services that are available to them.
- Treat all clients with dignity and respect. This includes prompt responses to client inquiries and timely processing of case actions.
- Inform workers that QC must review negative case actions and that the negative error rate is one of the four FNS bonus categories for states, which could bring additional funding into the State.
- At every opportunity, remind workers not to deny an application too early, providing the full time allowed to gather the necessary information to correctly determine the case. Many states use the slogan, “Don’t deny before it’s time.”

Remember: Good customer service has a direct impact on the agency’s negative error rate.

Top Leadership Commitment

Top leadership commitment has been the cornerstone to obtaining and maintaining high Food Stamp Program payment accuracy. The same holds true for the validity of negative actions, which can profoundly impact program access and customer service. It is critical that top leadership recognize and acknowledge that the negative error rate impacts program access and the level of customer service and make improving the negative error rate an agency-wide priority. Clearly, incorrectly denying, closing, or suspending households eligible to receive food assistance establishes barriers to program participation and the leadership must communicate this as unacceptable throughout the agency.

The leadership must set the expectation that households applying for the Program will receive an accurate determination of eligibility and those households found not to be eligible will receive timely and accurate notice of denial, termination or suspension. Inaccurately or inappropriately terminating, denying or suspending a household causes great hardship to the client(s) and hampers access to the Food Stamp Program. Without the food assistance they are seeking, children and adults may go hungry unnecessarily. Therefore, it is imperative that all staff clearly understand the goals and expectations set by top leadership to provide good customer service at all times.

Generally, States receiving a bonus in the negative error rate category achieve an error rate below one percent. Federal Regulations state that a negative error rate above one percent is indicative of poor customer service and therefore requires the completion of a corrective action plan. Setting performance goals each year, developing a plan to achieve the goals, and clearly articulating this to all staff shows management's commitment to make the program more accessible.

Below are various strategies that convey top leadership commitment to Food Stamp Program access through a lower negative error rate:

- ❑ The agency's performance goal or target is expressed to staff at all levels – including all functional areas within the state office and local offices from receptionists to county directors. They must be made aware of:
 - The commitment to program access;
 - The target for a low negative error rate; and,
 - The means for reaching the goal.
- ❑ Staff is held accountable for the negative error rate. The top leadership meets regularly with staff to review error rate trends and supports error review committee meetings.
- ❑ Staff is acknowledged and rewarded for negative error rate improvements and excellence. This is best accomplished through direct contact by top leadership with staff at functions such as conferences, staff meetings, and other opportunities to reinforce good performance.
- ❑ Top leadership is receptive to, and appreciates, new ideas for administering the Program and improving program access and customer service from all levels within the State agency.
- ❑ Corrective action plans are targeted and there is buy-in and understanding of what must be accomplished at all levels.
- ❑ Top leadership supports and encourages open communication among State agency staff

(policy, quality control, training, systems and corrective action) and between State and local staff to ensure that error causes are identified and eliminated.

- Top leadership supports system changes necessary to reduce or eliminate error causes and makes these changes a priority.

Data Analysis

The foundation for corrective action planning is good data analysis. To ensure you have a thorough understanding of a particular problem, it is crucial to identify the root cause of the problem and who or what lead to the invalid decision on the case. Without these essential pieces of information, at a minimum, you could be trying to fix something that really isn't broken! Below are several steps you should take to ensure a complete understanding of problem areas:

- **Gather data from all available sources**, such as:
 - ✓ Quality Control
 - ✓ Supervisory Case Reviews
 - ✓ Other Case Reviews, i.e. Peer Reviews, Special Review Team, etc.
 - ✓ Customer Complaints
 - ✓ Fair Hearings
 - ✓ Management Evaluation
 - ✓ Access Reviews
- **Be sure you know your data well.** Understand the definition of QC's codes. Meet with QC periodically to discuss what each code means. For example, if an eligible non-citizen was discovered by QC during their review, should they code this as a citizenship/non-citizen (130) or household composition (150) problem? The correct answer is this would be a citizenship/non-citizen problem because QC reviewers are directed not to code "150" if characteristics are specifically addressed under other 100 series Elements.
- **Maximize your analysis of other data sources**, such as those listed above. The additional data should serve as a supplement to the QC data giving a bigger picture of potential problem areas and allowing you to identify emerging trends early.
- **Monitor data on a continual basis to:**
 - ✓ Look for emerging error trends;
 - ✓ Target corrective action initiatives;
 - ✓ Determine the effectiveness of corrective action activities; and,
 - ✓ Identify the need for specific policy options/waivers.
- **Review errors to identify the source of the problem.** You need to investigate the cause of the error by closely examining the case record to identify the root cause. An error review committee is very helpful in this quest. Unlike payment errors (active cases), errors found in negative action cases are not coded for cause. However, the nature codes do provide information that can direct you toward the cause of the problem. Below are a few questions you can ask to help determine the root cause of an invalid negative action (or a payment error):
 - Are workers (and the automated system) providing the 30 days allowed for clients to provide requested information before denying an application?
 - Was the client made aware of the timeframe for providing needed verifications?
 - If in the processing of an application your agency allows a second 30 days to provide requested information, are they waiting the full 60 days from the date of application before denying the application?
 - Are workers waiting for the 10 days clients are given to provide verification before denying, terminating or suspending a case?
 - Do workers fully document the reasons for the negative action?

- ❑ Are the documents used as the source of ineligibility copied or is the information documented in the case file?
 - ❑ Does the worker know how to use the on-line manual efficiently and effectively to research policy? Is the on-line manual up to date?
 - ❑ Is there a paper manual available if needed? Is it kept up to date?
 - ❑ Is the policy written clearly?
 - ❑ Did the worker ask questions of their supervisor or another worker? Was the answer correct?
 - ❑ Does the worker know the proper way to enter the information into the automated system, using the correct codes, etc.? Have workers received initial/refresher training on system codes recently?
 - ❑ Did the worker try to use a system workaround when entering the case into the automated system? Do workers understand the ramifications of using system workarounds?
 - ❑ Is the system Help Desk responsive to worker inquiries?
 - ❑ Has a system change recently been implemented that might be fixing one problem but causing other problems?
 - ❑ When system changes are implemented, does eligibility staff receive clear instructions regarding the change, i.e., what the new screen looks like, how to enter information, new codes, what is going on behind the screen, policy related to the change, examples?
 - ❑ Did the worker ask the right questions during the interview to get all the needed information to make a good policy decision?
 - ❑ Is there an office procedure that could be causing the problem?
- **Review your analysis reports to determine their effectiveness.** The Food Stamp QC automated system has analysis reports available for negative actions. In addition, many States have created their own analysis reports. Consider creating analyses encompassing all the data sources available to assist you in identifying the root cause(s) of errors in your agency. Below are some key categories of information you should include in your analysis:
 - ✓ Error Element (i.e., wages & salaries, shelter costs, vehicles, etc.)
 - ✓ Nature Code – the circumstances surrounding the error
 - ✓ County, Unit and/or Worker responsible for the error – This category can help you to better target the corrective action strategy. Many times retraining everyone is not the answer.

Case Reviews

One of the most successful tools in attaining and maintaining high payment accuracy is a good case review system. The same holds true for ensuring a high level of validity for negative actions. Many States mandate case reviews because they have proven to be an integral part of their overall management of the Program by providing managers and supervisors valuable information on the validity and timeliness of case determinations. Information gathered from case reviews can help determine the root cause(s) of errors and thereby identify specific areas needing corrective action, such as policy clarification, refresher training, changes in office procedures, improved case record documentation, system changes, etc. Combining data from case reviews with the data collected from Quality Control reviews provide a firmer foundation on which to decide on appropriate corrective action initiatives.

All case review processes should include the requirement to review negative actions as well as active cases. Supervisors and managers should be trained periodically on the proper way to review a negative action and have available a review guide for their reference. It is important that a review of a negative action include a system review to ensure proper use of the automated eligibility system.

There are a number of different approaches to case reviews:

- **Short Term Projects** – Case reviews conducted on a targeted sample of the caseload usually focused on specific error prone elements of the case record for a short period of time. Consider using Quality Control data to determine targeted cases and/or error prone elements. These projects are generally undertaken to gather information needed to address a particular problem(s).
- **Peer Reviews** – Case reviews conducted by another eligibility worker within the same unit or, in some instances, units within the same office switch cases for review. Peer reviews work best when conducted prior to denying, terminating or suspending a case. Most workers would prefer to have a co-worker find their mistakes than their supervisor. Peer reviews provide another pair of eyes to catch reported information that was not included in the eligibility determination, helps to reinforce policy knowledge, and finds and corrects errors in a large number of cases.
- **Supervisory Case Reviews** – Either targeted or thorough case reviews conducted by supervisors. Generally there is a mandate that supervisors conduct a required number of reviews each month following a prescribed procedure. This mandate should include a minimum number of negative actions as well as active cases. These reviews are an excellent management tool for supervisors to check the validity of negative actions taken. They also provide valuable information on staff's ability to manage their workload, indicates when refresher training is needed, and contributes to the overall level of customer service provided by the unit, office, project area and State.
- **Third Party Reviews** – A re-review of a sample of completed case reviews, conducted by another supervisor or a higher-level manager, to determine the accuracy of the initial reviews completed by workers, supervisors or a special team of reviewers. For example, an initial case review is conducted by a supervisor and then re-reviewed by the office manager. All effective case review systems include a third-party review process to:
 - Ensure staff conducting initial case reviews have an accurate understanding of policy;

- Identify when case review refresher training is needed for the supervisor(s);
 - Ensure a thorough, rather than cursory, review is conducted;
 - Maintain the integrity and consistency of the review process, e.g., like problems are being coded in a like manner on the review instrument;
 - Enable the office or state to utilize supervisory case reviews as performance measures.
- **New Worker Reviews** – A thorough review of all negative actions completed by new workers, prior to denying, suspending or terminating, to ensure they have a thorough understanding of the program and are taking the appropriate action. The immediate supervisor generally conducts this type of review for the first 6 to 12 months of employment.
 - **Targeted Case Reviews** – Reviews focused on specific error prone negative actions and/or elements of the case. They are effective in isolating and correcting specific types of errors within an office, county or State. The specific error prone elements are generally identified through other types of case reviews.
 - **Error Review Committees** – A representative group of staff from all functional areas brought together on a regular basis to review cases that QC identified as being invalid actions. The committee should review and discuss all invalid negative actions to determine the root cause and possible corrective actions. This will reinforce top-level commitment to ensure all decisions to deny, suspend or terminate are accurate and will provide an opportunity to discuss trends and look for ways to improve customer service and the validity of negative actions.

Through case reviews it is possible to gather real-time data needed to determine the types of problems occurring and the root causes. In order to take a proactive approach to finding solutions that address the causes of invalid negative actions, review results should be made available to management within a one to two month timeframe after the case review is complete. Case reviews alone, without analysis and understanding of the causes of the errors and trends, is not productive. It simply becomes a “find and fix” and the next time a similar case is touched, the same error could easily be repeated. This data provides vital information for correcting case actions and identifying problem areas. It is also an important step to holding staff accountable for their work.

Tips for conducting case reviews:

- Create a case review sheet that is specific for looking at negative actions and collects detailed information about the actions taken.
- Implement a system to track negative actions found to be invalid and ensure corrective actions are implemented timely.
- Analyze the findings in a timely manner – the sooner the better.
- Determine the root cause of the problem. For example, it is common to assume that because there are a lot of problems occurring related to a particular policy, the workers need to receive refresher training. Before settling on that conclusion, check first to be sure the policy is clearly written, the computer system is properly programmed to handle the policy, and there are no procedures in place that could be causing invalid negative actions.
- Develop and implement corrective actions immediately once the root cause has been discovered.

- Conduct a targeted review 6 to 12 months after implementing the corrective action to ensure the problem has been effectively resolved.
- Make sure eligibility workers are using the appropriate termination, suspension or denial codes in the system and that documentation supports the action.

Corrective Action Planning

Corrective action planning is the process by which State and local agencies document initiatives to reduce or eliminate deficiencies in every area of program operations, including invalid negative actions, to provide responsive service to all households applying for the Food Stamp Program. Documenting your corrective action initiatives and sharing the Plan confirms top-level commitment to staff at all levels to continue to improve the efficient and effective administration of the Program.

Federal regulations require State's with a negative error rate of one percent or higher, as determined by Quality Control, to develop and implement corrective action initiatives to improve the validity of negative actions. Inaccurately or inappropriately terminating, denying or suspending a household causes great hardship to the client(s) and hampers access to the Food Stamp Program. Without the food assistance they are seeking, children and adults may go hungry unnecessarily.

Preparing a thorough yet easy to implement Corrective Action Plan can be as simple or as complex as you want it to be. The write-up for each corrective action initiative should contain the following information:

- ✓ A thorough description of the deficiency, including error element and root cause.
- ✓ The magnitude of the deficiency (or number of cases found in error) and the geographic extent (i.e., a statewide problem, one or more project areas, a unit within a project area).
- ✓ The data source(s) used to identify the deficiency and the magnitude (QC, supervisory reviews, fair hearings, ME reviews, access reviews, etc.).
- ✓ A complete description of the initiative developed to resolve the deficiency.
- ✓ The tasks, timeframes and person(s) responsible for each step of implementation of the initiative.
- ✓ A description of the plan to monitor implementation of the initiative.
- ✓ A description of the plan to evaluate the effectiveness of the initiative and the expected outcome.
- ✓ The current status of the initiative (include this in all Corrective Action Plan Updates submitted until the initiative has been fully implemented and evaluated).
- ✓ The name and title of the person who has overall responsibility for the Corrective Action Plan.

A sample format sheet is included. Feel free to use this format for documenting your corrective action initiatives. Use a separate format sheet for each initiative to ensure clear documentation of each problem area and each corrective action. Remember, thorough documentation of all corrective action initiatives shows your commitment to improve.

Below are some basic, easy to follow tips for corrective action planning:

- ❑ Start your corrective action planning with detailed data analysis. Ideas for good data analysis are addressed in the "Data Analysis" Key. Getting to the root cause of the problem is

essential.

- ❑ Involve staff at all levels in the corrective action process, including support staff. Pull together a corrective action committee to discuss problem areas identified in your data analysis. Staff is usually very willing to help. Asking for their assistance in solving a problem helps to build teamwork, shows staff you believe their input is valuable and ensures buy-in at all levels when implementing a corrective action initiative.
- ❑ Brainstorm corrective action ideas with the group. Don't automatically exclude new or different ideas before some exploration of their merits.
- ❑ Be realistic about the number and scope of corrective action initiatives undertaken at any one time. Focus your efforts on the areas most likely to yield the biggest payoff in improving program operations and the accuracy of negative actions.
- ❑ Once you see improvement in a particular area, don't then focus ALL your attention to another problem area. Staff may tend to think the other area is no longer a priority and doesn't require their attention either. For example, if you have focused all your efforts on improving payment accuracy in the last few years and now shift your entire focus to improving the accuracy of negative actions, you may see a slip in payment accuracy.
- ❑ Always assign target completion dates and the person(s) responsible for each step necessary to implement an initiative. Make the target dates reasonable so you can stay on track but don't allow so much time that the activity never gets implemented.
- ❑ Monitor to ensure implementation of each initiative is going according to schedule and the steps are being carried out correctly. This is important to the success of the initiative. Monitoring implementation should be done as simply as possible. If problems in carrying out the initiative are identified, immediately make the necessary modifications to the initiative to ensure success. If through monitoring you find the initiative just isn't going to work, abandon the initiative rather than waste valuable time and resources. Go back to the drawing board to develop a new initiative to correct the problem area.
- ❑ Plans for monitoring and evaluating need to be developed **at the same time** as the corrective action initiative.
- ❑ The evaluation process is very different than the monitoring process. Evaluation is done at the end of the trial period for the corrective action initiative to determine if it was successful in reducing or eliminating the targeted error(s).

FOOD STAMP CORRECTIVE ACTION PLAN

(Type additional information on a separate sheet of paper.)

Agency:

Date:

Office(s) and/or Unit(s) implementing this plan:

Description of deficiency, including associated error element and root cause:

Magnitude and geographic extent of deficiency and data sources used:

Complete description of activity developed to resolve deficiency:

Tasks/steps, time frames and person(s) responsible for each task/step:

Description of Task/Step	Person Responsible	Target Completion Date

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Agency:

Description of plan to monitor implementation tasks/steps and time frames:

Description of plan to evaluate effectiveness of activity to resolve deficiency:

Expected outcome: _____ percent reduction in error rate during next _____ months.

As of the date of this plan/update, the status of performing tasks/steps, meeting time frames and effectiveness of initiative to resolve deficiency:

Name and title of person who has overall responsibility for this plan:

Verification and Documentation

An important strategy for achieving a low negative error rate is to ensure that the case record fully documents the circumstances that led to the denial, termination or suspended case action. The case record, whether paper and/or automated, tells the story of the client's circumstances, and in order to verify the accuracy of the case determination, anyone reviewing the case record should be able to come to the same determination.

In conjunction with the importance of case file documentation is the need to ensure that all required verifications are provided and documented. The final determination of denial, termination or suspension along with the Notice to the client must also be documented in the case record. The Notice to the client must be sent timely and must fully document the reason for the negative case action.

Finally, if State or Federal Quality Control selects a negative action for review, all case record information that was used to make the decision to deny, terminate or suspend the case and all notices to the client, including information housed on the automated eligibility system, will be reviewed. Documentation must provide enough detail to allow a reviewer to determine the validity of the negative action.

Below are some tips for ensuring adequate documentation and verification of a negative case action:

- **Case Notes:** Eligibility workers must make certain that all conversations with the client, verifications received or other issues that lead to the final negative action are recorded in the case record.
- **Paperless or Automated System Documentation:** In States where documentation and case records are fully automated (a paperless system), verification and documentation contained in the automated record must be sufficient to establish the validity of the negative case action.
- **Documentation of Household Statements:** It is important for the eligibility worker to clearly and accurately document household statements regarding their income or resources, such as bank accounts, employment, etc., that would render the household ineligible from participation in the Program.
- **Withdraws:** Application withdraws should be requested by the client, not as a result of a suggestion or determination made by the eligibility worker. All negative actions must be based solely on statements. This may result in an invalid determination.
- **Verification Checklists:** The verification checklist is a source to verify why the household was denied. Regulations state the State agency must provide each household, at the time of application or recertification, a Notice that informs the household of the verification requirements the household must meet as part of the application process. At a minimum, the Notice should include examples of the types of documents the household should provide and the period of time the documents should cover.
- **Notice of Denial:** If the application is denied, the State agency shall provide the household with written Notice explaining the reason for the denial, the household's right to a fair hearing and the contact information for the local office. Again, the negative action reason provided on the client's Notice should correlate with the case file documentation. The primary rule to follow

when preparing Notices is to ensure:

- ✓ The Notice is written in such a way that the client will clearly understand the reason for the negative action; and,
- ✓ The Notice is provided timely and in accordance with Federal regulations.

Remember, ensuring that case files are well documented and that the proper timeframes have been followed and noted in the file are essential to a low negative error rate!

Computer System Enhancements

A highly functioning automated eligibility determination/processing system is key to achieving a high level of performance in the Food Stamp Program, including the area of negative actions. Misuse, misunderstanding or limitations of a system often cause households to receive incorrect notices of negative actions.

Some states have examined their automated eligibility systems to reduce the likelihood of errors occurring. Some of the actions/changes they have made include:

- Changing a system to prevent workers from denying an application prior to the 30th day. If data show that negative denial errors often occur because of caseworkers taking action prior to the 30th day, a change to the automated system, which prevents such actions, can prevent these errors from occurring.
- Changing a system so that an automatic denial occurs after 30/60 days (or less if your State has a waiver), which prevents cases from being held open longer than allowed.
- Ensuring that cases are not denied during the 10-day period clients have to provide verification. Providing training and/or system changes to ensure that cases cannot be denied during this period reduces or eliminates these errors.
- Relying on a system to make decisions. Some states find that a system that makes more of the decisions and relies less on workers' decisions results in fewer problems—including incorrectly denied applications or terminated cases.
- Ensuring that the automated system does not automatically close food stamps when eligibility for another program is terminated.
- Adding an electronic case file component to a system. A major problem area is that offices are often unable to find a case record. Electronic case filing or a good automated paperless system can ensure that case records are not lost and can be reviewed. Also, when making a determination, scanned documents reduce or eliminate lost documentation.
- Updating the system quickly to address areas in which the system is not correctly applying policy. If policy or procedures are programmed into the system incorrectly, improper denials and terminations can result. In addition, workers will be tempted to and may develop workarounds to "right the wrong." Therefore, workarounds should be identified and analyzed so that system corrections can be put into place.
- Reducing or eliminating the ability for workers to perform system workarounds that are shortcuts. This type of workaround is very error prone because workers are overriding the system and ignoring correctly programmed policy for expedience. This type of workaround, too, should be identified and analyzed.
- Providing adequate training and instruction for workers on using systems in a correct manner so they use the system correctly and don't have a need to develop workarounds:
 - If the state has an on-line policy manual, proper training on the manual should be provided so workers know how to use it.

- Workers need to understand what the different system codes mean and the consequences for entering incorrect codes. Instructions on the automated eligibility system should be easy to understand and provide examples whenever possible. Simply using an incorrect code can lead to an invalid negative action.
- Thoroughly testing any proposed computer changes and providing necessary guidance on new procedures are essential in ensuring that additional errors are not created. Conducting systematic regression testing ensures there are no unforeseen “ripple effects” due to the change that will increase rather than reduce errors.
- Creating/enhancing a system to send alerts on applications that need action or cases which are pending termination.
- Including local-level eligibility staff in discussions about system changes and enhancements. This is important because they use the system on a daily basis and may have great ideas on ways to enhance it and/or warnings about potential drawbacks.
- Updating the system to allow eligibility workers to document case actions in the system. Some states have provided templates for documentation to help ensure thoroughness and consistency.

Resource/Reference Tools for the Worker

Many agencies have found that providing eligibility staff with easy-to-use resource and reference tools has helped to reduce both invalid negative actions and payment errors. These tools serve as summaries and reminders of policies and procedures. Using the tools save staff time by reducing the number of occasions eligibility staff might have to reference the voluminous policy manual and can also help to ensure they apply the correct policies and procedures.

Below are several types of resource and reference tools agencies have found to be effective:

- **Checklists** – Generally a one-page document summarizing requirements that must be met prior to denial of eligibility or benefit approval. Checklists provide a simple means of assuring that all required items or documentation have been reviewed. Many agencies require a copy of the checklist to be included in the case record as documentation that all applicable items have been provided and considered in the eligibility determination.
- **Desk Guides** - Typically a more detailed version of a checklist but still convenient and easy to use. Many agencies use handy-to-use desk guides to summarize complex policies.
- **Tip Sheets** –Generally, tip sheets cover only one or two key points. They are often used to remind eligibility staff of a policy or procedure that is complex or error prone and should be sent out periodically. Some agencies are now providing tips via e-mail alerts that go directly to the individual workers or broadcast messages through the automated eligibility system.
- **Newsletters** – Agency newsletters can be a valuable source of information and serve many purposes. Some examples include: specific articles highlighting tips for accurate negative actions, policy clarifications, reminders about correct system codes, error rate data and error prone elements, as well as, recognition for individuals, units or all staff for achievements.
- **Interactive Games, Quizzes or Surveys** – These are just a few fun ways to test staff on program knowledge. They can also serve as an effective tool in the adult learning environment because they require the active involvement of the worker. Depending on the format, these tools may also be used to document training.

The above tools can address a variety of topics, including:

- **What is an acceptable document for verifying required eligibility elements?** – Examples of excessive documentation can also be provided to show a meaningful contrast.
- **What should be documented in a case record when a decision is taken to deny, terminate or suspend an application/case?** – This could include specific samples of good documentation versus poor documentation.
- **What should be reviewed one final time before action is taken to deny, terminate or suspend an application/case?** – This could be a tool for a supervisor or 2nd level approver.
- **What should be maintained in a case record after the action has been taken to deny, close or suspend an application or case?** – Remember, if a case record does not clearly document the reason for the action, it may cause the action to be considered invalid.

Tools For the Client

All negative actions impact customer service and slow the benefit delivery system for all applicants. By improving customer service, your negative error rate could be indirectly affected, i.e. could improve customer cooperation which could result in verifications being provided more timely.

Many of the denials, terminations and suspensions occur because the client was not aware of the necessity to provide required information and/or the timeframe for doing so to ensure completion of the application. While these actions may be valid, the household may be doing itself a disservice by not being aware of the proper reporting and verification requirements. In order to provide good customer service, the agency should make an effort to adequately educate the client. Also, the eligibility worker may initiate delinquent and/or erroneous actions resulting from poor communication with the applicant or misinformation provided by agency staff. To address and improve customer service, the State and local agencies must be committed to educating the client so they understand basic program rules and expectations.

The following suggestions will assist in addressing client education and program accessibility that could help reduce the occurrence of invalid negative actions:

- **Educational Video** – Continuous play videos shown in the local office waiting area provide a vehicle to communicate effectively to all applicants in an informative and entertaining way. A series of videos can be produced to present the program requirements in a client friendly manner. The information shared should emphasize items requiring verification, change reporting requirements, and the agency's timelines for processing the information.
- **Agency Posters and/or Fliers** – These items should be posted in waiting areas, worker offices/interview booths, and other common areas. The notices should be simple and easily understood to ensure the message reaches all educational levels. The information should emphasize the required verification items, reporting requirements, and the agency's time standards for processing the information.
- **Drop Boxes** – A secured container can be set-up in the waiting area, along with envelopes (best when preprinted with needed identifying information), for client convenience so that information may be dropped off without waiting to be seen by an eligibility worker. To provide the client with an assurance that the information was received, a sign-in sheet can be used to validate that information was left in the Drop Box. The office may also seek to place a secured container outside the office for clients to drop off information after hours.
- **Awareness Campaign** – A publicity campaign, through outreach and program access venues, can be used to emphasize the program's mandatory verification items and timelines. In this campaign, the non-profit helping organizations should be provided training/materials and encouraged to inform and assist potentially eligible individuals.
- **Electronic Voice Mail** – The use of a voice-activated phone system is a method for conveying program information to applicants/clients. A State can also set-up its system to provide information through the 1-800 number for all applicants/clients.
- **Checklist of the Mandatory Verification Items** – A checklist of the mandatory verification items the client must supply should be provided when the applicant requests an application.

The checklist would assist the applicant in collecting the needed information to quickly process the application.

- **Call Centers** – A call center can be a valuable mechanism that allows the client a quick and easy way to report pertinent information and receive a confirmation that it was appropriate without having to come into the office. The information provided can be quickly processed and an eligibility/benefit determination completed in a timely manner.
- **Tools for Waiting Areas** – The waiting area can be arranged to offer quicker service for applicants/clients seeking to report information or return requested verification items. The office can procure a fax machine with a dedicated line for applicants/clients to transmit information to the eligibility workers without waiting to be seen by staff. If this is not practical, the office can establish an “Express Line” for applicants/clients wishing to simply drop off information. A support staff member can accept the information and provide the client with a receipt with minimal wait time.

Regional Payment Accuracy Coordinators

Feel free to contact your Regional Payment Accuracy Coordinator for more information on any of the “Keys to Valid Negative Actions.”

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NOTE: An electronic copy of this document can be downloaded from the FNS Payment Accuracy/ Quality Control (PAQC) **Partner Web** along with additional best practices on valid negative actions: www.fnspartner.usda.gov

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